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MEMO ENDORSED

April 30, 2021

District Judge Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: 7:21-cv-00270-KMK
Turk v. Rubbermaid Incorporated

Dear District Judge Karas:

This office, with co-counsel James Chung, represents the plaintiff. In accordance with your Honor's Individual Rules, plaintiff requests an extension of the time to prove service or file a waiver of service.

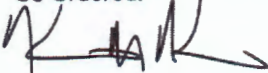
This action was filed on January 14, 2021. The deadline for service was April 14, 2021. The reason why proof of service was not filed on this action was because my office procedures at this time did not adequately account for cases which were not opened by this office. This should not have mattered since my office was listed on the complaint and received ECF notifications for this case. Nevertheless, it was still my responsibility to be aware of the relevant dates for any case on which I was listed as an attorney. Additionally, a new paralegal with my office had started approximately one month prior. I did not adequately instruct the paralegal about calendaring cases which I did not file. This issue has since been corrected so these issues will not happen again. Finally, I am in the process of adding personnel to assist with management of the cases for which I am an attorney of record.

Plaintiff requests an extension of twenty-one (21) days, until May 21, 2021 to prove service or file a waiver of service. This is the first request for an extension of time to complete service. No prior requests were granted or denied. This request does not affect any other scheduled dates. Defendant has not consented to this request because defendant, nor any representatives of defendant, have been in contact with my office since the filing of the complaint. Defendant will not be prejudiced by this request because it has not appeared in this action. Thank you.

Granted, but there will be more such extensions.

Respectfully submitted,

So Ordered.



4/30/21

/s/ Spencer Sheehan

Certificate of Service

I certify that on April 30, 2021, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan